

UNITED STATES DISTRICT COURT
District of Massachusetts

Civil Action
No. 05-10078-DPW

PETER A. CRAWFORD, Plaintiff

v.

WOLVERINE, PROCTOR & SCHWARTZ, INC.,
Steven F. Chilinski, Deepak S. Kulkarni,

Defendants

PLAINTIFF'S MOTION TO AMEND AND DISSOLVE PROTECTIVE ORDERS
IN LIGHT OF THE AMENDED COMPLAINT

REQUEST FOR ORAL ARGUMENT

Plaintiff hereby requests, pursuant to Local Rule 7.1(d), that oral argument be permitted on this motion.

MOTION

Now comes the plaintiff in the above-captioned action, and moves that this Honorable Court:

1. Dissolve its January 6, 2006 protective order relating to the 2005 recapitalization and the 2005 financial statements, issued in response to Defendants' Cross-Motion for a Protective Order; and
2. Modify its January 6, 2006 protective order relating to payments made to defendant Kulkarni, issued in response to Defendants' Second Motion for a Protective Order Concerning Evidence of Compensation and Other Payments

Made to Deepak Kulkarni to permit inquiry into any payments to Mr.

Kulkarni by any of the Wolverine Entities after the 2001 recapitalization

(December 28, 2001), as further set forth in the accompanying Memorandum;

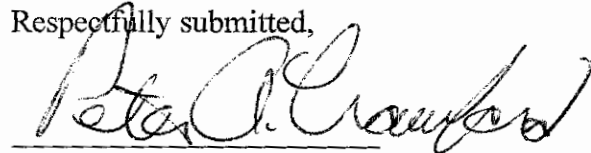
and

3. Modify its January 6, 2006 order, issued in response to Plaintiff's Motion to Compel Responses to his Request for Production of Documents, Set No. 1, such that Request 3 must be responded to without any limitation based upon the date that any document was generated.

CERTIFICATE OF CONFERRAL

Plaintiff hereby certifies that he has complied with the provisions of Local Rule 37.1, as further detailed in the accompanying memorandum.

Respectfully submitted,



Peter A. Crawford, pro se
23 Newcastle Dr. #11
Nashua, NH 03060
(603)888-4574

Date: 21 Feb. 2006